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July 7, 2016

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Grafton Municipal Center  
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**Subject: New Building Addition - 88 Westborough Road  
Special Permit and Site Plan Review**

Dear Joe:

We received the following documents on July 6, 2016:

- Correspondence from Whitman & Bingham Associates, LLC to Town of Grafton Planning Department dated July 1, 2016 re: Response to Comments.
- Full-size and reduced-size plans entitled Proposed Site Development Plan for New Building Addition at 88 Westborough Road, North Grafton, Massachusetts dated February 2016 and last revised June 30, 2016, prepared by Whitman & Bingham Associates, LLC. (8 sheets)
- Hydrology calculations dated July 5, 2016.
- Plan entitled Tributary Watershed Plan for Equipment Care Center in North Grafton, Massachusetts dated June 30, 2016, prepared by Whitman & Bingham Associates, LLC. (1 sheet)
- Technical information published by ADS re: Water Quality Units.

Graves Engineering, Inc. (GEI) has been requested to review and comment on the plans' conformance with applicable "Grafton Zoning By-Law" amended through October 19, 2015; Massachusetts Department of Environmental Protection (MassDEP) Stormwater Handbook and standard engineering practices on behalf of the Planning Board. GEI has also been requested to review and comment on the documents' conformance with applicable "1988 Rules and Regulations for the Administration of the Town of Grafton Local Wetlands By-Law" amended July 2005 on behalf of the Conservation Commission. As part of our initial review GEI visited the site on June 27, 2016.

This letter is a follow up to our previous review letter dated June 27, 2016. For clarity, the comments from our previous letter are *italicized* and our comments to the Applicant's responses are depicted in **bold**. Previous comment numbering has been maintained.

**Our comments follow:**

### **Zoning By-Law**

1. *A north arrow needs to be added to the locus plan on the cover sheet. (§1.1.3.3.3.d.8)*  
**Acknowledged. A north arrow has been added to the locus plan.**
2. *The approximate locations of buildings within 200 feet of the property line need to be shown on the plans. It is evident that there is an existing building to the west of the property along Westborough Road. (§1.1.3.3.3.d.11)*  
**Acknowledged. The approximate locations of houses at 82 and 84 Westborough Road were added to the plans.**
3. *Zoning setbacks are not illustrated or labeled on the plans. (§1.1.3.3.3.d.13)*  
**Acknowledged. The front, side and rear zoning setbacks have been illustrated on the plans. Note 3 was also added to Sheet 2, but it has incorrect dimensions of 15 feet for the side and rear setbacks. Nonetheless, the side and rear setback lines were drawn at 35 feet from the property lines.**
4. *It is unclear what the entranceway surface is into the property. A label should be added that specifies what this surface is. (§1.1.3.3.3.d.14)*  
**Acknowledged. A label has been added to the existing conditions plan specifying the entranceway surface as pavement.**
5. *Lot coverage calculations need to be provided and shown on the plans. (§1.1.3.3.3.d.15)*  
**Acknowledged. Building coverage and lot coverage calculations have been added to Sheet 1.**
6. *The facility's water service was not shown on the plans. (§1.1.3.3.3.d.28)*  
**Acknowledged. The existing water service from Westborough Road to the site has been added to the plans.**

### **Regulations for the Administration of the Wetlands By-Law**

7. *GEI has no issues relative to compliance with these regulations.*  
**No further comment.**

### **Hydrology & MassDEP Stormwater Management**

8. *Spot grades should be shown in the containment area to demonstrate that water will flow toward the double catch basin and to confirm the limits of the impoundment. Of particular concern is the presence of a stormwater discharge point at the southern edge of the existing pavement at the limits of the impoundment (up-gradient of wetland flags wf-13 and wf-14). Water will only be impounded up to the elevation of this discharge point.*  
**Acknowledged. Spot elevations have been added to Sheet 3 to specify top and bottom of berm elevations. From these, it can be seen that the double catch basin has the lowest elevation in the containment area.**
9. *We concur with the concept of installing the proposed stormwater collection and treatment system; this system will improve stormwater quality. However, no supporting calculations were submitted to show that the proposed drainage system and proprietary treatment unit have adequate hydraulic capacity. Any calculations submitted must include a map of the tributary drainage area.*

**Acknowledged.** A hydrologic analysis has been submitted to demonstrate adequate hydraulic capacity of the proposed drainage system.

10. *There is a stormwater discharge point at the southern edge of the existing pavement (up-gradient of wetland flags wf-13 and wf-14) that consists of a channel leading from the pavement/gravel area to the wetland. The channel has eroded. It would be prudent to line the channel with an erosion-resistant material. Consideration should also be given to constructing a forebay or similar BMP, perhaps at the top of the channel, to capture sediment from the gravel parking area located up-gradient of the discharge point.*

**Acknowledged.** The plans were revised to include rip-rap channel protection along the existing eroded channel. Additionally, a rip-rap forebay has been added to the plans at the top of the channel. Construction details for both had been added to Sheet 7.

11. *The Stormwater Report states that the project does not contain Land Uses with Higher Potential Pollutant Loads (LUHPPL). We disagree. Because the site is used for the storage and maintenance of a trailer fleet, the use is a LUHPPL.*

**We have no issue with the design relative to compliance with Standard 5 – LUHPPL. The design will result in improved water quality.**

**We stand by our opinion that the existing land use is a LUHPPL. We agree with the design engineer that trailers pose less of a potential threat for higher pollutant loads than do tractors. Nevertheless, the potential for pollutants exists by way of the trailer fleet cleaning, maintenance and repair activities; by way of the tractor activity at the site moving trailers to/from the site as well as moving trailers around the site; by way lubricants used for the trailer axles, brake systems and trailer/truck coupling systems; and by way of brake dust and road salt drippings (in winter). Finally, MassDEP Stormwater Handbook Volume 1, Chapter 1, Page 12 identifies exterior fleet storage areas as a LUHPPL. The Handbook does not distinguish between trailer fleets or tractor fleets. In our opinion, the activities and potential pollutant loads associated with storing, maintaining and repairing a trailer fleet are not substantially unlike those associated with a truck fleet or with a fleet composed of both trucks and trailers.**

### General Comments

12. *There is an unlabeled, hatched box adjacent to the westerly located existing building. This site feature should be labeled.*

**Acknowledged.** A label has been added to specify the object as an existing concrete pad.

13. *There is a typo on the proposed utility plan. There is a leader labeled as a double catch basin (DCB) that needs to be changed to a drain manhole (DMH).*

**Acknowledged.** The label has been corrected to be a drain manhole (DMH).

14. *Number 7 under Site Work Construction Notes needs to refer to the Town of Grafton and not the City of Worcester.*

**Acknowledged.** A correction has been made to refer to the Town of Grafton instead of the City of Worcester.

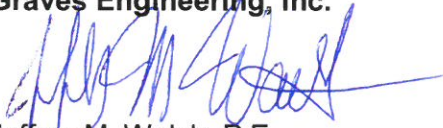
15. We understand that the Planning Board will review the architectural plans for the building addition.

**No further comment.**

We trust this letter addresses your review requirements. Feel free to contact this office if you have any questions or comments.

Very truly yours,

**Graves Engineering, Inc.**



Jeffrey M. Walsh, P.E.  
Vice President

cc: Grafton Conservation Commission  
Brian Milisci, P.E., Whitman & Bingham Associates